



United States
Department of
Agriculture

Forest
Service

Columbine Ranger District
San Juan National Forest

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Dear Interested Party

This is an update on the status of the planning process for the *Weminuche Landscape Grazing Analysis*. You are receiving this letter because you previously submitted comments on this project.

As you may have already heard, the San Juan National Forest (SJNF) has decided to move the environmental analysis for this project into an Environmental Impact Statement (EIS) instead of continuing with the Environmental Assessment (EA) process. Through this letter, I hope to answer some questions that may arise as a result of this change.

Why change to an EIS? As the official who will be signing the decision for this project, I found I could not be sure that the analysis would support the "Finding of No Significant Impact" determination that is required for an EA. In this case, there appears to be too much controversy about the scientific literature regarding the process of disease transmission between domestic and bighorn sheep, too much uncertainty about some assumptions made by the *Bighorn Risk of Contact Tool* to the circumstances found on the SJNF, and too much uncertainty about the effectiveness of the project Design Criteria to prevent physical contact between domestic and bighorn sheep. For these reasons, I could not ensure that no significant impact would occur to the viability of bighorn sheep populations on the SJNF. Because the *possibility* of a significant impact exists, I could not sign a "Finding of No Significant Impact." In such cases, procedures are to move the analysis into an EIS.

What are the main regulatory differences between and EA and EIS? An EIS allows for findings of significant impacts. An EIS has a longer comment period on the draft (45 days for EIS versus 30 days for EA), which may be extended, if appropriate. Preparation of an EIS must be announced at the national level in the Federal Register, and requires Environmental Protection Agency review.

What else might be different? Additional analysis will be added where it was missing, most notably in the Socio-Economic section, to reflect not only the value of grazing permits for individuals and the woolgrower industry, but also to reflect the value of bighorn sheep and wilderness recreation to local economies. Editorial changes will be made for better readability, or for clarification. The Proposed Action will be altered after considering comments we have received, in order to more clearly portray what I feel the decision might be.

Does the process completely start over? No, a Draft EIS will be prepared based primarily on the analysis you have already seen in the Draft EA, but with information added where needed. There is no need to re-submit the same comments; all public input received to date has already



been considered, will be retained in the project record, and will be treated as scoping for the EIS. If you have something *new* to submit, or better supporting information, please feel free to submit it during the upcoming designated comment period on the Draft EIS. Any comments submitted will become part of the public record for this project and will be available for public inspection, including names and addresses.

Results of public comment to date: The SJNF held a scoping period in 2012, and then two 30-day comment periods on a draft EA in May-July 2014. We received over 450 comment letters from individuals and organizations during the three periods, which boils down to about 430 different individuals or organizations (because some commented more than once). Comments included over 310 form letters from members of one environmental organization. Commenters also included 9 environmental or pro-wildlife organizations, 6 livestock industry proponent organizations, and 5 government agencies including interest from US Congressmen. You can view summary listings of the comments, along with the draft EA, on the web at:

<http://www.fs.usda.gov/projects/sanjuan/landmanagement/projects>

Following are some examples of comments that we heard repeatedly, which will be addressed in the EIS:

- Livestock grazing in designated Wilderness is not appropriate.
- Sheep grazing ruins the alpine vegetation, wildflowers, and pollutes the water.
- Sheep grazing ruins recreational experiences by creating stink, noise, and unpleasant guard dog encounters.
- Grazing fees are too low.
- Domestic sheep are a disease threat to the bighorn sheep population, which are an economic generator as well as a native species.

- The FS is mandated by law to manage for multiple uses, including grazing.
- The monitoring data presented in the EA show that the range is in good condition.
- Grazing is a historical use of the land, a way of life, and a key part of ranchers' livelihoods.
- The livestock industry is an economic contributor to the local economy.
- The scientific literature does not support the claim that domestic sheep cause bighorn die-offs.

Estimated Timeline:

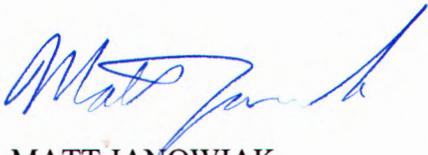
These estimated timeframes are intentionally vague because they depend on many factors, including how long it will take my staff to collect and write up the additional analysis, how much response is generated during the forthcoming comment period, and other staff workloads.

- Late fall 2014: The SJNF expects to formally announce the intent to prepare an EIS by publishing a "Notice of Intent to prepare an EIS" in the Federal Register and a legal notice in the Durango Herald. This will not start a comment period.
- First half of 2015: My staff will work to convert the draft EA to a Draft EIS and add the needed analysis. Then, we will announce a "Notice of Availability of a Draft EIS" and a 45-day public **comment period**. During this time frame, we are planning to hold a **public meeting**. Because of the remoteness and vastness of the landscape, it is logistically impractical to offer a public field trip.

- Mid-2015: A 45-day **objection period** will be offered on the Final EIS and draft Record of Decision. Anyone who has submitted specific written comments during any designated public comment period will be eligible to object to the pending decision. Objection resolution might take several months.
- End of 2015: Depending on how long it takes for objection(s) resolution, we estimate there could be a **decision** by the end of calendar year 2015.

Thank you for your interest in the project. If you have questions, please feel free to contact me, Matt Janowiak, District Ranger, at 970-884-1438, or Cam Hooley, Environmental Coordinator, at 970-884-1414.

Sincerely,



MATT JANOWIAK,
Columbine District Ranger